

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YOINBER ALFONSO MOREY MOREY,

Defendant.

8:25CR-109

FILED  
US DISTRICT COURT  
DISTRICT OF NEBRASKA

MAY 19 2025

OFFICE OF THE CLERK

INDICTMENT

18 U.S.C. § 371  
18 U.S.C. § 2113(a) and 18 U.S.C. § 2  
18 U.S.C. § 1030(a)(4), (b), & (c)(3)(A)

The Grand Jury charges that:

**COUNT I**

**CONSPIRACY TO COMMIT BANK BURGLARY**

From on or about March 1, 2025, and continuing through on or about April 10, 2025, in the District of Nebraska and elsewhere, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit acts and offenses against the laws of the United States, namely to enter or attempt to enter a building used in whole or in part as a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny, in violation of Title 18, United States Code, Section 2113(a), and took overt acts in furtherance of the conspiracy.

**Overt Acts**

In furtherance of the conspiracy and to effect its objects, at least one of the conspirators committed at least one of the following acts:

1. From on or about April 4, 2025, and continuing through on or about April 5, 2025, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, traveled to the Five Points Bank at 518 N. Eddy

Street in Grand Island, Nebraska wherein they opened the Automated Teller Machine (hereinafter "ATM") on the bank premises using an ATM barrel key and removed the ATM's hard drive and installed a different hard drive carrying malware in an attempt to carry out a jackpotting scheme. A jackpotting scheme is a type of cyberattack where criminals exploit vulnerabilities in ATMs to force them to dispense cash without debiting an account.

2. On or about April 8, 2025, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, traveled to the Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska wherein they attempted to open the ATM located on the bank's premises using an ATM barrel key to access the computer system within the ATM to install hard drives and/or malware to carry out an ATM jackpotting scheme.
3. On or about April 8, 2025, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, traveled to the Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska wherein they opened the ATM on the bank's premises using an ATM barrel key and removed the ATM's hard drive and installed a different hard drive carrying malware in an attempt to carry out an ATM jackpotting scheme.

All in violation of Title 18, United States Code, Section 371.

**COUNT II**  
**ATTEMPTED BANK BURGLARY**

From on or about April 4, 2025, and continuing through on or about April 5, 2025, in the District of Nebraska, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used

in whole or in part as the Five Points Bank at 518 N. Eddy St. in Grand Island, Nebraska, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT III**

**ATTEMPTED BANK BURGLARY**

On or about April 8, 2025, in the District of Nebraska, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as the Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT IV**

**ATTEMPTED BANK BURGLARY**

On or about April 8, 2025, in the District of Nebraska, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as the Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit a larceny.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT V**

**CONSPIRACY TO ACCESS A PROTECTED COMPUTER**

From on or about March 1, 2025, and continuing through on or about April 10, 2025, in the District of Nebraska and elsewhere, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, conspired to knowingly



and with intent to defraud accessed a protected computer without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Sections 1030(a)(4), (b) & (c)(3)(A).

**COUNT VI**

**ATTEMPTED ACCESS OF PROTECTED COMPUTER**

From on or about April 4, 2025, and continuing through on or about April 5, 2025, in the District of Nebraska, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, knowingly and with intent to defraud accessed and attempted to access a protected computer, to wit: the computer system contained within the ATM at the Five Points Bank at 518 N. Eddy Street in Grand Island, Nebraska, without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Section 1030(a)(4), (b) & (c)(3)(A) and 2.

**COUNT VII**

**ATTEMPTED ACCESS OF PROTECTED COMPUTER**

On or about April 8, 2025, in the District of Nebraska, the defendant, YOINBER ALFONSO MOREY MOREY, and other individuals known and unknown to the Grand Jury, knowingly and with intent to defraud accessed and attempted to access a protected computer, to wit: the computer system contained within the ATM at the Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska, without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency.

In violation of Title 18, United States Code, Section 1030(a)(4), (b) & (c)(3)(A) and 2.

A TRUE BILL.

FOREPERSON 

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
SEAN P. LYNCH, #25275  
Assistant U.S. Attorney